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PERS 77-2313/a

OGC HAS REVIEWED.

25 JUL 1977

MEMORANDUM FOR: Assistant For Information/DDA

FROM : F. W. M. Jarney
Director of Personnel

SUBJECT : Senate Bill 555, Financial Disclosure

REFERENCE : (a) OLC Memo to DDA, dtd 8 Jul 77, subj:
Financial Disclosure
(b) AI/DDA Informal Request for Comments
on Reference (a)

1. We concur with the OLC position that the Agency should press for complete exemption for the reasons cited, among others. The complications of an individual going under cover at a later date would, we believe, create security problems in addition to the overall problem of disclosure of a roster of Agency employees.

STATINTL

2. These matters apart, we agree the only fall back position is for a review of the disclosure statements by cleared representatives of the Office of Government Ethics or of the Intelligence Oversight Board, without subsequent public disclosure. We would think the Intelligence Oversight Board would be the preferable selection as this membership would have the requisite clearances and the best insight into the security ramifications.

3. With reference to the other proposals, we would have the following comments.

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a. The number of Agency personnel overtly detailed to the Congress or other government agencies are so few in number that disclosure by these people would not appear to be a matter of serious security concern. On the other hand, if a total Agency exemption is granted, it should probably be applied to them as well as those working in-house. We see it more as a matter of equity than security, however.

b. Insofar as Executive Schedule employees are concerned, again the number, limited to 19, as well as their relatively prominent position in the Agency and the Community should cause no undue security concern.

(Signed) F. W. M. Janney

F. W. M. Janney

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STATINTL

OP/P&C/RS [REDACTED] kj (21 Jul 77)

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ROUTING AND RECORD SHEET

SUBJECT: (Optional)

FROM:

Legislative Counsel
6D15 HQ

EXTENSION

6126

NO.

DATE

14 November 1977

TO: (Officer designation, room number, and building)

DATE

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OFFICER'S INITIALS

COMMENTS (Number each comment to show from whom to whom. Draw a line across column after each comment.)

1.

NOV 1977
Deputy Director of Personnel
5E13 HQ

2.

DDI Pers / PC

11/15/77

3.

John

4.

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STATINTL

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Attached are S. 555, H.R. 6954 and H.R. 1. S. 555 has passed the Senate. The other two are pending before the Rules Committee and probably will not be taken up until next session. Part C of Title II of H.R. 1, Title III of H.R. 6954 and Title II of S. 555 each contain restrictions on post-employment activities by Federal employees, and I would appreciate any comments you may have on them. Thanks.

Office of Legislative Counsel

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ROUTING AND RECORD SHEET

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FROM:

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12 October 1977

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1.

O/Personnel
5E13 HQ

17 OCT 1977

17 OCT 1977

2.

DD Per / PC

10/18/77

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3.

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6.

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STATINTL

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Attached for your information is a copy of H.R. 6954, which has been reported out to the floor by the House Post Office and Civil Service Committee. Title III of the bill contains the first Administration proposal on post-employment activities. A similar provision has already passed the Senate. The House Judiciary Committee is also considering a proposal, and we will forward a copy as soon as we obtain it. Titles I and II of the bill deal with financial disclosure, and we are consulting with the various committees concerning them.

Office of Legislative Counsel

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